

ALEX G. TSE (CABN 152348)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 15-00518 MMC
)	
Plaintiff,)	
)	STIPULATION REGARDING RESTITUTION
v.)	AND [PROPOSED] ORDER
)	
ROBERT JACOBSEN,)	
)	
Defendant.)	
)	

Defendant, Robert Jacobsen, and the United States, by and through counsel, agree and stipulate as follows:

Pursuant to 18 U.S.C. § 3663A, defendant agrees to pay restitution of \$2,430,662.47. That number includes the following specific amounts:

(1) \$180,662.47 to the Broderick Street Trust (the principals of which are S.H. and S.G.) which, according to escrow records, paid \$180,662.47 of its own funds in the purchase of the Broderick Street house;

(2) \$1.5 million to NATC, which has expended slightly over \$2 million in connection with the Broderick Street house to this date, but which may recover funds from the proceeds of the sale of the property if it receives a favorable resolution of its litigation over the property and

STIPULATION RE: RESTITUTION AND [PROPOSED] ORDER
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1 a successful sale of the property. The parties agree that an approximately \$500,000 offset from
2 current losses accounts for the reasonable possibility of NATC's future recovery as well as the
3 reasonable possibility of NATC's ongoing accumulation of costs relating to the property.
4 Counsel for NATC has informed government counsel that NATC agrees to this restitution figure.
5 (3) \$750,000 to Old Republic Title Company, for the amount it paid to cover the losses
6 on the Danville house.

7
8 **IT IS SO AGREED AND STIPULATED.**

9 Dated: October 18, 2018

10 /s/
11 BENJAMIN KINGSLEY
Assistant United States Attorney

12 /s/
13 KENNETH WINE
14 Attorney for Defendant
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[PROPOSED] RESTITUTION ORDER

Pursuant 18 U.S.C. § 3663A, defendant is ordered to pay \$2,430,662.47 in restitution as part of the final judgment in this case. The Court finds that this is a reasonable determination of the amount of money that the victims lost as a result of defendant's scheme to defraud for which he has been convicted, and the Court finds that these losses were proximately caused by the scheme to defraud.

The Court orders that restitution be awarded to each victim in the amounts so stipulated by the parties.

In light of the above, the Restitution Hearing, scheduled for November 7, 2018, is hereby VACATED.

IT IS SO ORDERED.

Dated: October 22, 2018


HON. MAXINE M. CHESNEY
UNITED STATES DISTRICT JUDGE